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June 4, 2007

**Via Facsimile (212) 805-0426**

Hon. Laura Taylor Swain  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 755  
New York, NY 10007

### MEMO ENDORSED

IT IS ORDERED that counsel to whom this Memo Endorsement is sent is responsible for faxing or otherwise delivering promptly a copy to all counsel and unrepresented parties and filing a certificate of such service within 5 days from the date hereof. Do not fax such certification to Chambers.

Re: **Seamount International Association Ltd. v. Kuehne and Nagel Ltda.**  
Docket No. 06 Civ. 5648 (LTS)  
LML Ref: 1078

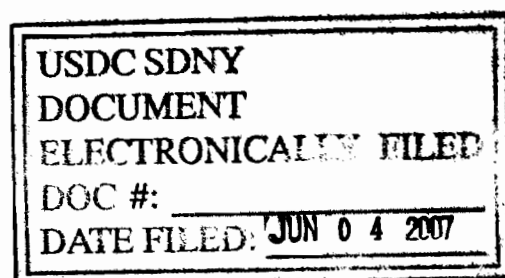
Dear Judge Swain:

We represent the Petitioner, Seamount International Association Ltd., in the above captioned action. Together with the Respondent, Kuehne and Nagel Ltda., we write to provide the Court with a joint status update and to request that this case be kept on the suspense calendar for another 30 days.

Regarding security, Respondent has provided the requested guarantee, and Petitioner is making arrangements to set forth its guarantee as well. The parties have begun arbitration proceedings, and hope to dismiss the instant action as soon as Respondent is in receipt of Petitioner's guarantee.

Thus, by this letter, we request that the case be placed on the suspense docket for another 30 days while the Petitioner arranges for the outstanding guarantee. We stipulate that a joint status letter be submitted to the Court by July 6, 2007 unless the parties agree to dismiss the action before this date.

We are available to discuss the foregoing at your Honor's convenience.



Also, please find attached hereto courtesy copies of the Notices of Change of Address for Patrick F. Lennon and myself, which were filed with the Court earlier today.

Respectfully yours,




Nancy R. Peterson

cc: By Facsimile (212) 732-3232  
Judith A. Lockhart  
Carter, Ledyard & Milburn LLP

The foregoing requests are  
granted, and the Clerk of  
Court is respectfully requested  
to enter the address changes  
in the Court's records.

SO ORDERED.



6/4/07  
LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE